

# EXHIBIT 3

**From:** [Marquez, Lillian](#)  
**To:** [Scutero, Peter \(LAW\)](#); [Olney, Michael \(LAW\)](#); [NYC Law Protest Team](#); [Zimmerman, Tobias \(Law\)](#); [Weng, Jenny \(Law\)](#); [Robinson, Amy \(LAW\)](#); [Hiraoka JR., Joseph \(LAW\)](#)  
**Cc:** [Lalit Loomba](#); [Steven Bushnell](#); [PBALitigationTeam@schlamstone.com](#); [AG-NYPDLitigation](#); [GrayLegalTeam@dwt.com](#); [Payne Litigation Team](#); ["Sow-Legal"](#); [rolonlegalteam@aboushi.com](#)  
**Subject:** Re: [EXTERNAL] FW: Activity in Case 1:20-cv-08924-CM IN RE: NEW YORK CITY POLICING DURING SUMMER 2020 DEMONSTRATIONS Order  
**Date:** Wednesday, April 26, 2023 8:49:07 PM

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Peter,

As I am sure you can understand, I can't get a response together after business hours so plaintiffs will be unable to respond by 9 pm as you requested. If you are filing tonight, please note in your request: "plaintiffs did not have sufficient time to consider Defendants' revised proposal which was communicated on Wednesday at 5:57 p.m.. and required a response the same night by 9 p.m."

Thank you,  
Lillian

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**From:** Scutero, Peter (LAW) <PScutero@law.nyc.gov>  
**Sent:** Wednesday, April 26, 2023 5:57 PM  
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**Subject:** RE: [EXTERNAL] FW: Activity in Case 1:20-cv-08924-CM IN RE: NEW YORK CITY POLICING DURING SUMMER 2020 DEMONSTRATIONS Order

Dear Counsel,

Thank you for meeting with us yesterday. We write to follow-up on the meet and confer in the interest of resolving this discovery dispute without further Court involvement. It is Defendants' belief that doing so would be more beneficial to the parties than fully litigating this dispute, as well as consistent with the Court's interests given the April 24<sup>th</sup> Court order. (Docket # 956). As mentioned during the meet and confer, the proposals we provided were intended to chart a path

forward for the parties with respect to 30(b)(6) testimony on Topics 20 and 21. We ask Plaintiffs to consider these proposals in good-faith and for that same purpose of moving past this dispute.

For purposes of resolving this dispute, Defendants will make DI Kanganis available for another day of 30(b)(6) testimony, with court reporting costs covered by the City, regarding the questions contained in Plaintiffs' letter motion (See Docket # 955) as well as the questions that the witness was unprepared to answer during the deposition, to the extent those questions are within the scope of Topics 20 and 21 and do not fall within the scope of another Topic. It is our interpretation that Topic 20 encompasses the City and NYPD's responses, including their coordination and cooperation, to certain external government organizations' investigations into the City's (as a municipal organization) response to the 2020 protests. We do not interpret this Topic to include investigations into individual officers. With respect to Topic 21, it is our interpretation that this Topic concerns the NYPD and the City's response to the items listed in subparagraphs (a) and (b). The scope does not include anything other than these two organizations' response.

Concerning Topics 20 and 21, it is Defendants' view that Plaintiffs' interpretation of the scope of these topics is overly broad. As we informed you prior to the deposition, we do not interpret Topic 20 to cover specific investigations into allegations of misconduct by members of the NYPD, and further informed you that another 30(b)(6) witness, designated to Topic 17, would be the appropriate witness to answer those questions. We also informed you that we do not interpret the Topic to cover the Commissioner's decisions to depart from CCRB recommendations, and again informed you of another witness designated for Topic 18 as the appropriate person to answer these questions. In a further attempt to avoid any issues coming up as to scope at the deposition, we notified you that the witness would not be prepared to testify to specific investigations involving individual officers or the Commissioner's decisions. Far from being obstructionist, we were providing you specific detail as to who would be able to address these various topics. We firmly disagree with your apparent position that you get to question multiple 30(b)(6) witnesses on the same topics.

During yesterday's meet and confer, we informed you that it is Defendants' position that many of the questions posed to the witness fell clearly outside the scope of Topics 20 and 21. Indeed, many of the questions were about arrest procedures, probable cause, DAs' coordination with NYPD on arrests, among many others. None of these questions fit within Topics 20 and 21, which generally concern NYPD's response to investigations by external governmental organizations. We have provided a few examples of the questions that clearly fall outside the scope below.

- Can you walk me through the steps that officers were trained to take in preparing arrests for prosecution starting from the time of an arrest? (Tr. 35:13 - 17)
- Are you aware of any specific trainings that NYPD conducts on those procedures [for preparing an arrest for prosecution]? (Tr. 41:8-10)
- And can you tell me what is the process of assigning another officer to an arrest? (Tr. 48:12-14)
- You stated before that there is an 18-month statute of limitation for a CCRB investigation. What happens if the CCRB cannot conclude their recommendation by the end of the statute of limitations? (Tr. 204:3-7)

And if a civilian reports to a police officer or mentions that they are injured, is an officer required to put that information in a TRI report? (Tr. 238:13-16)

With respect to revealing how we will prepare the witness differently, we cannot answer that question in detail without waiving privilege. However, Defendants will prepare the witness to answer the questions mentioned above to the extent responsive information is known or reasonably available to the City. Generally, preparation of witnesses consists of reviewing relevant documents, photos, videos, and other materials; learning information from agency personnel, authorities, and offices; and meeting with counsel. We will make good-faith attempts to educate the witness of information known or reasonably available to the City should DI Kanganis not have personal knowledge of information that would respond to the questions mentioned above. If there are other relevant exhibits of a reasonable number you wish to share in advance of the deposition, please provide them.

Given that Defendants have offered to make DI Kanganis available for a continued deposition, we request Plaintiffs withdraw their motion and confer with us on the scope of Topics 20 and 21. We continue to endeavor to collaborate with Plaintiffs to ensure that we identify the proper 30(b)(6) witnesses to address your various Topics.

We ask the courtesy of a response to our proposal by 9 p.m. today. Thank you.

Regards,

Peter Scutero  
New York City Law Department

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**Sent:** Wednesday, April 26, 2023 1:34 PM

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**Subject:** RE: [EXTERNAL] FW: Activity in Case 1:20-cv-08924-CM IN RE: NEW YORK CITY POLICING DURING SUMMER 2020 DEMONSTRATIONS Order

Counsel,

We apologize for the delay in following-up to yesterday's meet and confer. We are working on response to your questions internally and will send it to you as soon as possible.

Peter Scutero  
New York City Law Department

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**Importance:** High

Good morning,  
Defendants are available to Meet & Confer this afternoon at 1:00-1:30pm.

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Good evening,

Per the Court's recent order to discuss our filing at ECF No. 955, Plaintiffs are available to meet tomorrow, Tuesday, 10:30- 11:30 or between 12:30 and 1:30 p.m. Wednesday is less workable as I have less availability and am still waiting for times for a meet and confer with Joe on the IAB files, but, if not taken up by that meeting, can try to find a time 10:30 to 11:30.

Please advise as to when you can meet on this.

Regards,  
Lillian

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**Southern District of New York**

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**Case Name:** IN RE: NEW YORK CITY POLICING DURING SUMMER 2020 DEMONSTRATIONS

**Case Number:** [1:20-cv-08924-CM](#)

**Filer:**

**Document Number:** [956](#)

#### **Docket Text:**

**ORDER: A telephonic discovery conference to resolve the matter raised in Docket # 955 shall take place on Friday, April 28, 2023, at 11:00 a.m. A responsive letter must be filed by April 26, 2023. Additionally, the parties are directed to meet and confer as soon as possible. If there are any developments at such a meeting that materially change the position a party took in a letter, such party may file a second, supplemental letter as long as the supplemental letter is filed by April 27, 2023. To dial into the telephone conference, the attorneys should use the number they were previously provided. The public may listen to the conference by dialing 877-810-9415 and using access code: 4086346. The Court will record the proceeding for purposes of transcription in the event a transcript is ordered. However, any other recording or dissemination of the proceeding in any form is forbidden. Only one attorney for plaintiffs and one attorney for defendant will be permitted to address the Court with respect to this dispute. When addressing the Court, counsel must not use a speakerphone. Each attorney is directed to ensure that all other attorneys on the case are aware of the conference date and time. SO ORDERED., (Telephonic Discovery Hearing set for 4/28/2023 at 11:00 AM before Magistrate Judge Gabriel W. Gorenstein.) (Signed by Magistrate Judge Gabriel W. Gorenstein on 4/24/2023) (ama)**

**1:20-cv-08924-CM Notice has been electronically mailed to:**

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